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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	Case No. CR 13-00120 EMC
Plaintiff)	
v.)	STIPULATION AND PROPOSED
)	ORDER CONTINUING STATUS DATE
JASON BAUM,)	
Defendant.)	

The parties, the United States of America and Defendant Jason Baum, stipulate to request, jointly, that the Court continue the status conference currently set on April 3, 2013, at 2:30 p.m. to the new date of April 10, 2013, at 2:30 p.m., before this Court.

This joint request is made because counsel for the government has a conflict with the earlier April date – a pretrial conference with Judge Seeborg for an upcoming trial. Therefore, the parties jointly request that the Court continue the matter to Wednesday, April, 10 2013, at 3:30 p.m.

Failing to exclude the time between April 3, 2013 and April 10, 2013 would unreasonably deny the defendant continuity of counsel and would deny counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. §

3161(h)(7)(B)(iv). Further, the ends of justice served by excluding the time between April 3, 2013 and April 10, 2013 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial.

SO STIPULATED.

Dated: April 2, 2013

/s/

MARC PRICE WOLF
Special Assistant United States Attorney

Dated: April 2, 2013

/s/

ELIZABETH FALK
Attorney for Defendant

~~[PROPOSED]~~ ORDER

For the aforementioned reasons, the hearing in the above-captioned case is continued to April, 10 2013, at 2:30 p.m. Further, the time between April 3, 2013 and April 10, 2013 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

IT IS SO ORDERED.

DATED: 4/3/13

